

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

FILED
COURT OF APPEALS
DIVISION II

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COURT OF WASHINGTON

STATE OF WASHINGTON

Respondent,

v.

Anthony Ralls
(your name)

Appellant.

No. 56530-7-II

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

I, Anthony Ralls, have received and reviewed the opening brief prepared by my attorney. Summarized below are the additional grounds for review that are not addressed in that brief. I understand the Court will review this Statement of Additional Grounds for Review when my appeal is considered on the merits.

Additional Ground 1

Under In Re Manschke #96773-3; I must be resentenced by a Judge that considers youths mitigating effect, factors and acknowledges discretion to act on it. Manschke creates a significant change in the law-enlarging the youth-based class to which Miller protections apply - that is material to my sentence, must apply retroactively. This new law is material to my sentence as I was 19 years old at the time of this crime. Because the sentencing court did not exercise the discretion required under Manschke, I was prejudiced and must be resentenced.

Additional Ground 2

The Miller decision constitutionally guaranteed an individual sentence that considers the mitigating qualities of youth at the time of their crimes for the purpose of punishment. Consideration of these factors are mandatory and not optional. So pursuant to the new rule in Houston-Scomlers; Ali; Young-Cheng Tsai; Domingo-Cornello I must be afforded the same.

If there are additional grounds, a brief summary is attached to this statement.

Date: 2/10/22

Signature: Anthony Ralls